

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

----- X
AMDOCS (ISRAEL) LIMITED, an Israeli : Case No. 1:10-CV-910 (LMB/TRJ)
Corporation, :
Plaintiff, : **JURY TRIAL DEMANDED**
: v. :
OPENET TELECOM, INC., a Delaware :
Corporation, and OPENET TELECOM LTD., an :
Irish Corporation, :
Defendants. :
----- X

**PLAINTIFF AMDOCS' OBJECTIONS AND COUNTER-DESIGNATIONS TO OPENET
TELECOM, INC. AND OPENET TELECOM LTD.'S DEPOSITION DESIGNATIONS
AND WITNESS LIST**

Pursuant to the parties' agreement and scheduling order in this matter, Plaintiff Amdocs (Israel) Ltd. ("Amdocs") hereby objects to Defendants Openet Telecom, Inc. and Openet Telecom Ltd.'s (collectively, "Openet") deposition designations and witness list contained in Openet Telecom, Inc. and Openet Telecom Ltd.'s Rule 26(a)(3) Pre-Trial Disclosures served on May 13, 2011.

Regarding Openet's witness list, Amdocs reserves the right to file motions in limine and/or *Daubert* motions in accordance with this court's scheduling orders.

Amdocs counterdesignates and objects to the below-listed testimony in response to Openet's designations as follows:

Witness	Deposition Date	Defendant's Direct Designations	Plaintiff's Objections	Plaintiff's Counter- Designations
Tal Givoly	February 10, 2011	8:7-24 9:17-10:4 23:3-25:10 51:24-52:25 56:9-57:18 87:18-87:22 96:12-96:14 100:22-101:20 101:22-102:4 124:4-124:9 137:5-137:25 194:2-198:11 220:12-25 221:3-19 225:6-226:20	R, 403, L R, 403, L 88:5-90:13; 111:2-15 96:16-20 131:8-137:4 226:21-227:8	
	February 11, 2011	446:12-447:22 448:23-450:5 456:11-457:15 477:8-479:3 481:7-18	R, 403, L R, 403, L Speculation R, 403, L	476:15-477:7; 479:4-13 481:19-24
	March 3, 2011	530:3-10 636:12-642:6		
	April 26, 2011	5:7-14 6:18-7:10 20:13-21:3 57:12-60:25 66:8-10 70:12-71:18	R, 403 R, 403 R, 403 R, 403	
Limor Schweitzer	February 24, 2011	9:13 29:10-30:25 96:20-97:20 101:19-102:13 103:6-18 104:23-106:25 107:4-20 109:15-110:7 128:13-130:1	106:1-4 leading Assumes facts not in evidence	31:1-32:22 101:4-18 110:21-111:6
		R, 403, L		

Witness	Deposition Date	Defendant's Direct Designations	Plaintiff's Objections	Plaintiff's Counter- Designations
		131:17-132:11	R, 403, L	132:12-20
		135:13-19	R, 403, L, speculation	
		135:21-135:25	R, 403, L, speculation	
		142:25-143:24	R, 403, L	
		156:19-159:25	R, 403, L	
Udi Hershkovich	February 9, 2011	7:4-23		
		46:20-47:14		47:18-48:10
		48:15-21		
		50:24-52:24		50:1-4; 50:14-23; 53:8-22
		59:16-61:5		54:25-55:20; 55:25-57:12 57:17-59:3 61:6-65:3 66:2-67:1 68:1-69:22
		94:16-22	R, L	
		96:23-97:4	R, L	
		97:07	R, L	
		106:9-108:24		
		138:25-139:12		138:6-24
Zur Yahalom	February 24, 2011	7:11-8:14		
		41:17-21		
		42:1-6		
		42:8-16		
		112:19-113:4	R	14:5-19
		113:6-7	R, F	14:5-19
		226:15-227:3	R, 403	
		227:5-7	R, 403	
Niall Byrne	February 3, 2011	7:2-7	H, R	
		11:11-17		
		13:2-3		
		84:21-86:6		
Noel O'Rafferty	March 9, 2011	8:9-20	H, R	
		28:7-14		
		31:1-7		

AMDOCS' OBJECTION KEY FOR DEPOSITION DESIGNATIONS

H = Hearsay. Amdocs objects to this testimony because it constitutes or contains hearsay and no exception applies. (Fed. R. Evid. 801 & 802)

L = Conclusion of Law. Amdocs objects to this testimony because it contains conclusions of law.

F = Foundation. Amdocs objects to this testimony on the ground that the foundation necessary for its admission has not been laid and is not laid in the testimony itself. (Fed. R. Evid. 602)

403 = Unfair Prejudice. Amdocs objects to this testimony because its probative value is substantially outweighed by unfair prejudice and/or confusion of the issues. (Fed. R. Evid. 403)

R = Relevance. Amdocs objects to this testimony because it is not relevant to any issue to be decided in this case. (Fed. R. Evid. 401 & 402)

Plaintiff reserves the right to amend and/or supplement these objections and/or counterdesignations prior to trial. Plaintiff reserves the right to further object to any designated testimony based on rulings on trial motions and summary judgment/Markman motions not yet filed, or for any other reason.

Dated: May 20, 2011

Respectfully submitted,

/s/
Gregory H. Lantier (Bar. No. 65657)
James L. Quarles III (Bar No. 44993)
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Phone: (202) 663-6000
Fax: (202) 663-6363

Nels T. Lippert, *pro hac vice*
Calvin Walden, *pro hac vice*
Laura A. Sheridan, *pro hac vice*
Victor F. Souto, *pro hac vice*
WILMER CUTLER PICKERING
HALE AND DORR LLP
399 Park Avenue
New York, New York 10022
Phone: (212) 230-8800
Fax: (212) 230-8888

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of May, 2011, I served on the following counsel for Openet Telecom, Inc. and Openet Telecom, Ltd. via ECF the foregoing Plaintiff Amdocs' Objections and Counter-Designations to Openet Telecom, Inc. and Openet Telecom Ltd.'s Deposition Designations and Witness List:

Brian H. Pandya, Esq.
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006

____/s/_____
Gregory H. Lantier (Bar. No. 65657)
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, DC 20006
Phone: (202) 663-6000
Fax: (202) 663-6363

Attorney for Plaintiff